

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

MARCH 5 1997

MEMORANDUM

SUBJECT: Approvals for Continuation of RCRA Hazardous Waste Reporting and Record Keeping

FROM: Elizabeth Cotsworth, Acting Director
Office of Solid Waste

TO: Senior RCRA Policy Advisors, Regions 1 - 10

The purpose of this memo is to notify you of the recent approvals for the continuation of reporting and record keeping requirements under RCRA for hazardous waste generators and regulated facilities. We also sent each state director a letter about this.

Under the Paperwork Reduction Act, the Environmental Protection Agency (EPA) must request approval from the Office of Management and Budget (OMB) to continue the Agency's information collection activities. OMB recently approved seven information collection activities listed below, which have an impact on the implementation the RCRA hazardous waste program.

- 1997 Hazardous Waste Report ("Biennial Report")
- Notification of Hazardous Waste Activity
- RCRA Hazardous Waste Permit Application and Modifications, Part A
- Part B Permit Application, Permit Modifications and Special Permits
- General Hazardous Waste Facility Standards
- Hazardous Waste Specific Unit Requirements and Special Waste Processes and Types
- Requirements for Generators, Transporters and Disposers under the RCRA Hazardous Waste Manifest System

We have not changed the information required to be reported or records to be kept for six of the information collections; we did, however, eliminate some reporting for the 1997 Biennial Report. Also, we clarified the Notification booklet by consolidating all the discussions about when to renotify; and we updated the State and EPA Regional contact lists for the Notification and Part A Permit booklets. Please see the attachment for details about each of the approvals.

You (and states that have their own) may continue to use your remaining copies of the previously approved Notification and Part A forms booklets; and states may use their remaining copies of their Manifest if they adhere to the special notes. Please note the date changes and other special changes that we made to the EPA forms; states will need to update their forms and booklets if they print their own. We have sent each state director a letter with this information.

Thank you for your attention to these important implementation matters. If you have any questions, please contact the listed staff person for the specific item.

Attachment

CC: Key Regional RCRA Contacts
OSW Division Directors
David Nielsen, Office of Enforcement and Compliance Assurance

APPROVALS FOR THE CONTINUATION OF RCRA REPORTING AND RECORD KEEPING REQUIREMENTS FOR HAZARDOUS WASTE GENERATORS AND REGULATED FACILITIES (February 1997)

Approved Information Collections

These are the recent approvals and expiration dates for each with any special notes about the forms:

- 1. 1997 Hazardous Waste Report ("Biennial Report")** [EPA Form 8700-13 A/B] (40 CFR Parts 262, 264, and 265): Approved 9/3/96; Expires 9/30/99. Contact Robert Burchard at 703-308-8450.

EPA revised the forms and eliminated several reporting requirements for 1997. The forms and instructions reflect three major changes.

(1) Generators and RCRA permitted Treatment, Storage and Disposal Facilities (TSDFs) will no longer be required to report any RCRA hazardous wastes managed in exempt units, defined as those units that are not under RCRA hazardous waste permitting requirements.

(2) The Waste Treatment, Disposal, or Recycling Process Systems (PS) form has been eliminated.

(3) The Waste Minimization questions from the Identification and Certification (IC) and Waste Generation and Management (GM) forms have been eliminated.

States participated in reviewing the draft of the revised booklet with assistance from the National Governors Association. The booklet is being completed and should be sent to the States and EPA Regions by early spring.

- 2. Notification of Hazardous Waste Activity** [EPA Form 8200-12] (40 CFR Parts 262, 263, 264, 265, 266, 270, and 279): Approved 10/9/96; Expires 10/31/99. Contact James Michael at 703-308-8610.

EPA did not change the form. We did revise the instructions in the booklet to assist the respondents better in completing the form, especially about when to resubmit it; we also updated the State and EPA Regional contacts list. We are currently preparing a new printing of the booklets; these should be available by early April from EPA's National Center for Environmental Publications and Information in Cincinnati. You may continue to use your remaining copies of the Notification form booklet.

- 3. RCRA Hazardous Waste Permit Application and Modifications, Part A** [EPA Form 8700-23](40 CFR Part 270): Approved 10/1/96; Expires 10/31/99. Contact Chris Rhyne at 703-308-8658.

EPA did not change the form. We updated the State and EPA Regional contacts list. We are currently preparing a new printing of the booklets; these should be available by early April from EPA's National Center for Environmental Publications and Information in Cincinnati. You may continue to use your remaining copies of the Part A form booklet.

4. Part B Permit Application, Permit Modifications and Special Permits [No form] (40 CFR Parts 264 and 270): Approved 12/31/96; Expires 12/31/99. Contact Chris Rhyne at 703-308-8658.

EPA did not change the current requirements.

5. General Hazardous Waste Facility Standards [No form] (40 CFR Parts 264 and 265): Approved 11/4/96; Expires 11/30/99. Contact Chris Rhyne at 703-308-8658.

EPA did not change the current requirements.

6. Hazardous Waste Specific Unit Requirements and Special Waste Processes and Types [No form] (40 CFR Parts 261, 264, 265, and 266). Approved 1/27/97; Expires 1/31/2000. Contact James Michael at 703-308-8610.

EPA did not change the current requirements.

7. Requirements for Generators, Transporters and Disposers under the RCRA Hazardous Waste Manifest System [EPA Form 8700-22] (40 CFR Part 262, 263, 264, 265, 266, and 270): Approved 9/30/96; Expires 9/30/99- see note. Contact Ann Codrington at 703-308-8825.

EPA did not change any of the requirements or data elements on the form; there are however, U.S Department of Transportation changes in the shipping paper requirements that affect the form. The following notes apply to the manifest; please review these carefully.

Three-year approval: The Uniform Hazardous Waste Manifest has been approved for three years instead of two years. This renewal expires 9/30/99.

Expiration date not required on Manifest Forms: Because unused forms are often discarded when past the expiration date, EPA requested that expiration dates no longer be required on newly printed manifests. Expired forms may still be used, however, if the old expiration date is crossed out and the form contains the OMB control number 2050-0039, which has not changed.

Burden and Certification Statements: EPA has changed the burden statement as required under the Paperwork Reduction Act to reflect revised burden estimates. The U.S. Department of Transportation recently informed us of changes to their hazardous materials shipping paper that also affect the Manifest. EPA is preparing a memorandum describing these changes in detail; we will distribute it in the next few weeks. You may continue to use current supplies of the form. If you have questions in the meantime, you may contact Ann Codrington at the number above.